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December 13, 2019

VIA ECF

Hon. Frederic Block
United States District Court, EDNY
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Barca, et al* Indictment # 19 CR 575 (FB)
Defendant George Campos

Dear Judge Block;

I represent George Campos in this indictment. Mr. Campos is at liberty on a substantial bond, secured by the home jointly owned by him and his wife, who is a suretor on the bond. His travel is restricted to EDNY, SDNY, DCT, and otherwise as approved by PreTrial Services. I write to respectfully request that his bond be modified in order to permit certain travel during the holiday season. There are two family gatherings he wishes to attend, both within the confines of the Northern District and thus outside his travel restrictions.

On Christmas Eve, December 24, the family will celebrate at the home of Mr. Campos' stepdaughter. He and his wife would travel to her home in Kingston, New York that morning, returning home by midnight. On December 26, they would travel to Queensbury, New York, in Warren County, with extended family to attend a high school basketball tournament in which their grandchildren are playing. They will return home no later than the 29th. Their precise itinerary has been provided to PreTrial Services.

I have discussed this request with AUSA Keith Edelman, who advises that the Government does not object. I have also been in touch with PreTrial Officers Amanda Carlson (EDNY) and Vincent Adams (SDNY, where Mr. Campos resides and is supervised) and neither has an objection to this request.

Thank you for your courtesy and consideration.

Respectfully yours,

JOHN S. WALLENSTEIN

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